

The Dow Chemical Company Midland, Michigan 48674

2030 DOW CENTER December 1, 1999

VIA CERTIFIED MAIL Z 289 678 930

Carol Browner, Administrator U.S. Environmental Protection Agency P.O. Box 1473 Merrifield, VA 22116

Charles Auer (7405)
U.S. Environmental Protection Agency
401 M Street SW
Washington, DC 20460

ATTENTION CHEMICAL RIGHT-TO-KNOW PROGRAM

ORTHO-PHENYLPHENOL: A FIFRA REGISTERED SUBSTANCE ON THE HPV LIST

Ortho-Phenyl Phenol (CASRN 90-43-7) is currently on the U.S. HPV list and is also registered under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA). As you know, in order to obtain a FIFRA registration, registrants must conduct and submit to EPA extensive health and environmental effects testing. EPA then must carefully review the data, and make a determination that the intended use of the substance tested will not cause unreasonable adverse effects. The data requirements to support this determination are extensive, and go well beyond the screening-level requirements of the OECD/SIDS and U.S. HPV programs.¹

Dow and Bayer propose that this substance receive a designation of "1," indicating that the chemical is not considered a candidate for testing under the HPV Challenge Program. To support this, enclosed are three lists of studies, including the EPA MRID numbers, which have previously been submitted to the Office of Pesticide Programs. EPA should not encourage replication of studies as this is a waste of animals and other resources. Summaries of each listed study should be available from the Office of Pesticide Program.

Sincerely,

Gregory G. Bond
Corporate Director of Product Responsibility

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Enclosures

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¹ FIFRA also contains exclusive use, confidentiality and data compensation provisions that restrict access to and use of test data by non-registrants (and their agents). These provisions are designed to protect the significant investment in research, development and intellectual property required of companies that are able to obtain a FIFRA registration.

PDMS Search - Display MRID and Citation

Last Search Submitter: 59265 Citations Selected: 16

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- 41729400 Mobay Corp./Dow Chemical Co. [1990] Submission of Chronic Texicity Data in support of Orthophenylphenol Phase 2 and Phase 3 Response. Transmittal of 1 study.
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- Wahle, B.; Christenson, W. (1996) Technical Grade ortho-Phenylphenol: A Combined Toxicity/Oncogenicity Testing Study in the Rat: Lab Project Number: 7908: 92-272-SC. Unpublished study prepared by Eaver Corp. 4282 p.

*** END OF OUTPUT ***

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PDMS Search - Display MRID and Citation

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